ENSV Inspection Transmittal Summary Report

Media:
RCRA

Inspection Type:
Other

Inspection Date:
12/13/2016

Transmittal Date:
2/3/2017

Preliminary SNC Findings:

NOV / NOPV / NOPF:
No

Inspector:
MICHAEL MARTIN

FEB 03 2017

Facility Name:
Recycletronics

Address:
1220 Steuben Street
Sioux City
IA
51105

ID Number:
[redacted]6

Activity Number:

MM Participationg Progams:
Exemption 2

Federal Activity:

Federal Facility:
No

Potential EJ:

SBREFA Provided:	Security Handout Provided:	MM Screening Completed:	EMS ISO 14001:	Compliance Officer:
N/A	N/A	Yes	No	REBECCA WENNER

Selection Criteria 1:
Case Development

Selection Criteria 2:

ACS Code:

Inspection Findings:
N/A

Target Quality:
N/A

571487

REPORT OF RCRA FOLLOW-UP INSPECTION

At

RECYCLETRONICS
1220 Steuben Street
Sioux City, Iowa 51105
(712) 224-3158

EPA ID Number: None

On

December 13, 2016

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Sciences and Technology Division

1.0 INTRODUCTION

At the request of the Air and Waste Management Division, I conducted a Resource Conservation and Recovery Act (RCRA) follow-up inspection at Recycletronics, located in Sioux City, Iowa, on December 13, 2016. The inspection was conducted under the authority of Section 3007(a) of RCRA, as amended. During the inspection, I documented the facility's past and current activities and site conditions. The inspection report and attachments present the results of the follow-up inspection. The inspection was conducted as a Level B Multi-Media Inspection and the *Region 7 Multimedia Screening Checklist* is included as Attachment 1.

2.0 PARTICIPANTS

Recycletronics:
Aaron Rochester, Owner
Evere Gutierrez, Supervisor

Iowa Depart of Natural Resources:
Sue Johnson, Land Quality Bureau
Amy Wilken, Land Quality Bureau

U.S. Environmental Protection Agency (EPA):
Michael J. Martin, Physical Scientist (Lead)
Rebecca Wenner, Physical Scientist

3.0 INSPECTION PROCEDURES

Upon arriving unannounced at Recycletronics at 8:29 a.m. on December 13, 2016, Ms. Johnson, Ms. Wilken, Ms. Wenner, and I met Mr. Gutierrez. I introduced myself to him and asked to speak with Mr. Rochester. Mr. Gutierrez stated that Mr. Rochester was away from the office and called him on a cell phone at 8:31 a.m. At 8:34 a.m., I spoke with Mr. Rochester on the cell phone and informed him that I was on-site to conduct an RCRA follow-up inspection. At 8:50 a.m., Mr. Rochester arrived at the facility and I introduced myself to him. I presented him with my EPA credentials and explained the purpose and procedures of the inspection. I next presented him with a copy of RCRA Section 3007(a), which provides inspection authority. I explained my need to collect accurate information and presented him with a copy of Title 18 U.S. Code, Sections 1001 and 1002. He was made aware of his confidentiality rights and was informed that a *Confidentiality Notice* would be provided at the end of the inspection to make or not to make any confidentiality claims. Messrs. Rochester and Gutierrez acted as the official facility representatives during the course of the inspection. Mses. Johnson and Wilken served in an observatory role during the course of the inspection. Ms. Wenner provided assistance with the visual inspection, provided a Letter of Warning/Request for Information (attachment 2) to Mr. Rochester, and discussed each line item on the Letter of Warning/Request for Information with Mr. Rochester.

The focus of the inspection was to collect information regarding the facility's past and current activities and site conditions. The inspection consisted of a discussion of facility operations, waste generation and waste management; and a visual inspection of cathode ray tubes (CRT) and used electronics management areas. Ms. Wenner and I conducted a visual inspection of the following: (1) Disassembly Area, (2) Warehouse (Glass Area and Commodity Area), (3) Dock Area, (4) Basement, and (5) Outside Perimeter. See attachment 3 for the Facility Map. Ms. Wenner and I conducted a drive-by inspection at the following locations: (1) 3313 Northbrook Drive, Sioux City, Iowa 51105, (2) 1313 11th Street, Suite D, Sioux City, Iowa 51105, and (3) 2301 G Street, Sioux City, Nebraska 68766. Document photocopies and photographs were collected as inspection documentation (attachments 1-8 and photos 1-74 with attached photolog). I followed the inspection procedures discussed in the RCRA Compliance Evaluation Inspection Standard Operating Procedure (No. 2321.1D), unless noted differently.

At the conclusion of the inspection, I provided Mr. Rochester with a *Confidentiality Notice* (attachment 4) and a *Receipt for Documents and Samples* (attachment 5), which he signed as acknowledgement of receipt. No confidentiality claims were made by Mr. Rochester. Per Ms. Wenner (AWMD RCRA Compliance Officer), violations of RCRA would not be cited at the time of the inspection. Therefore, a *Notice of Violation* was not provided to Mr. Rochester.

4.0 OBSERVATIONS

4.1 Facility Information and Operations

Recycletronics operates an electronics recycling facility. The facility has been in operation at the 1220 Steuben Street location since September 2016. The facility is contained in one 22,000-square foot building (10,000-square foot office space and 12,000-square foot warehouse space), staffed by five employees, and operates from 7 a.m. to 4:30 p.m., Tuesday through Friday. Prior to September 2016, Recycletronics operated at 3313 Northbrook Drive, Sioux City, Iowa 51105 (2013 to August 2016) and 1313 11th Street, Suite D, Sioux City, Iowa 51105 (2013 to 2015). Mr. Rochester stated that during Summer 2015 to October 2015, Recycletronics generated a mixture of crushed lead funnel glass and unleaded panel glass and transported it from the 1313 11th Street location to 2301 G Street, Sioux City, Nebraska 68766. Mr. Rochester stated that Recycletronics does not operate at 2301 G Street, Sioux City, Nebraska 68766.

Recycletronics receives electronics (computers, televisions, printers, cell phones, audio/visual equipment, etc.) from city collection events (Orange City, Iowa, Sioux City, Iowa, etc.), hosting collection events, drop-off events, and landfill collection activities. For collection events, tractor trailers and rental trucks with lifts are used to collect the electronics. Once on-site, the electronics are dismantled by personnel and segregated into various commodities (copper, cable, mixed wire, circuit boards, and plastic). The commodities are sold to brokers based on the highest bid. Mr. Rochester stated that the facility has the capability to process 500 pounds of electronics per day. Televisions and computer monitors that contain CRTs are removed of plastic, the seal holding the lead funnel glass and unleaded panel glass together is cut, and the lead funnel glass and unleaded panel glass are accumulated in separate one-cubic yard cardboard boxes. Mr. Rochester stated that during a busy month, 13 to 60 one-cubic yard cardboard boxes of broken lead funnel glass are generated.

4.2 RCRA Status

The 1220 Steuben location had not been inspected for RCRA compliance prior to this inspection. The 3313 Northbrook and 2301 G Street locations were both last inspected for RCRA compliance on May 23, 2016, by the EPA. From my records review, it appears that the 1313 11th Street location had not been inspected for RCRA compliance. From my review of the EPA RCRA Handler Information Report (attachment 6), it appears that Recycletronics had not notified the EPA of any hazardous waste activities. Mr. Rochester stated that the facility does not generate any hazardous waste. At the time of the inspection, I did not observe any known hazardous waste being generated or accumulated on-site. Therefore, I determined Recycletronics to be a non-generator of hazardous waste. However, the facility's hazardous generation status could possibly change based on the management of CRTs.

4.3 CRT Management

CRT Waste - CRTs are processed at the Glass Area. The seal joining the lead funnel glass and unleaded panel glass is cut, the broken lead funnel glass and unleaded panel glass are accumulated in separate one-cubic yard cardboard boxes, and the full boxes of glass are moved to the Commodity Area for storage.

Mr. Gutierrez stated:

- Two to three 1-cubic yard cardboard boxes of broken lead funnel glass are generated per week.

- Four to five one-cubic yard cardboard boxes of broken unleaded panel glass are generated per week.

- Once full, one-cubic yard cardboard boxes of broken unleaded panel glass are labeled with the words "Universal Waste" (photos 5 and 6). See attachment 7 for the Universal Waste Label.

- One-cubic yard cardboard boxes (labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" and "Do Not Mix with Other Glass Material") that previously stored broken lead funnel glass are reused for the storage of unleaded panel glass.

- Broken glass on the concrete floor in the Warehouse is swept up, managed as lead glass, and stored in one-cubic yard cardboard containers along with broken lead funnel glass.

Mr. Rochester stated:

- The last electronics collection event occurred in State of Minnesota during November 2016. Five semi-loads of electronics were collected from the November 2016 collection event.

- Prior to March 2016, broken lead funnel glass was recycled by Closed Loop Recycling located in Illinois and Arizona and Doe Run located in Missouri. The last off-site shipment of broken lead funnel glass to Doe Run was during March 2016. Four to five months ago, 45,000 pounds of broken lead funnel glass was shipped to Kusi Cooksey located in Illinois for recycling.

- During a busy month, 13 to 60 one-cubic yard cardboard boxes of broken lead funnel glass are generated.

- Broken unleaded panel glass is non-hazardous based on analysis.

- Seven to eight months ago, broken unleaded panel glass generated by Recycletronics was transported by Gill Hauling (Jackson, Nebraska) to the L.P. Gill landfill (Jackson, Nebraska). The broken unleaded panel glass was used with a methane pipe system.

- Broken unleaded panel glass is no longer sent to the L.P. Gill landfill and an eight to nine-month stockpile of broken unleaded panel glass is currently on-site.

- A granulator unit was purchased from ERS located in Chicago, Illinios (date of purchase not provided), broken lead funnel glass and unleaded panel glass would be crushed, sand would be added to the glass mixture, and the glass/sand mixture would be sold to Berkley Asphalt (Sioux City, Nebraska) and other asphalt and concrete companies in the future. No mixed glass/sand mixture had been sold to date. A sample size of glass/sand mixture was generated during Summer 2016, analyzed by Test America (city and state not provided), and determined to be non-hazardous. He talked to someone at EPA Region 7 (the name of the person not known) during Summer 2016 regarding the glass/sand mixture being added to asphalt and concrete. The person at EPA Region 7 informed him to keep the analytical results on-site.

- Wants to sell Recycletronics in the next three to four months, move to Central Florida, and become an electronics recycler broker in Central Florida.

I asked Mr. Rochester if he had any documentation of shipments of broken lead funnel glass sent to Closed Loop Recycling, Doe Run, and Kusi Cooksey. In addition, I asked Mr. Rochester if he had any documentation of shipments of broken unleaded panel glass sent to the L.P. Gill landfill. Mr. Rochester stated that his shipping records were stored in cardboard boxes in the basement. During the visual inspection of the basement, there were no shipping records for review. Mr. Rochester did provide an explanation on the location of the shipping records. I asked Mr. Rochester if he had any electronic shipment records. Mr. Rochester, stated "No." At the time of the inspection, Mr. Rochester did not provide me with any shipping records for review.

I asked Mr. Rochester if he could provide me with the analytical report for the broken unleaded panel glass sent to L.P. Gill, Incorporated. He provided me with a 2010 one-page document from L.P. Gill, Incorporated (attachment 8). The document referenced analytical data, but it did not list any analytical results. The document referenced the unleaded glass material from Recycletronics that would be used as a bedding material for piping involving the collection of methane gas at the L.P. Gill, Incorporated landfill in Jackson, Nebraska. At the time of the inspection, Mr. Rochester did not provide me with any analytical data regarding the unleaded panel glass sent to L.P. Gill, Incorporated.

I asked Mr. Rochester if he could provide me with the analytical report for the glass/sand mixture that was analyzed by Test America during Summer 2016. Mr. Rochester stated that he could not locate the analytical report. At the time of the inspection, I did not observe any glass/sand mixture being generated or accumulated on-site. In addition, I did not observe a granulator unit on-site. The location of the granulator unit was not determined at the time of the inspection.

4.4 Observations

A. Disassembly Area

At the Disassembly Area, I observed non-CRT electronic equipment (radios, circuit boards, etc.) being disassembled with air powered tools at four work stations (wood benches). The disassembled components (wire, circuit boards, etc.) were being sorted and accumulated in one-cubic yard containers.

B. Warehouse

Inside the Warehouse (12,000-square feet), I observed:

- An estimate of 300 one-cubic yard cardboard containers of broken lead funnel glass, broken unleaded panel glass, and electronics (non-flat screen televisions, flat screen televisions, computer monitors, radios, etc.) (photos 1, 3-9, 13-27, and 29-31). The containers were commingled and either double-stacked or triple stacked. Due to the lack of aisle space, fragility of the containers, and safety considerations, I could not visually inspect the condition and contents of each container. I asked Messrs. Rochester and Gutierrez if they had an inventory or tracking system for the containers stored inside and outside the warehouse. Both stated, "No." Mr. Rochester stated that all the containers had been on-site for at least six to nine months.

    - Out of the 300 one-cubic yard cardboard containers, I observed five full one-cubic yard cardboard containers of broken CRTs labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" and "Do Not Mix with Other Glass Material" (photos 4 and 9).

    - Out of the 300 one-cubic yard cardboard containers, I observed four full one-cubic yard cardboard containers of broken lead funnel panel glass labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" and "Do Not Mix with Other Glass Material" (photos 1, 7, 21, and 23).

    - Out of the 300 one-cubic yard cardboard containers, I observed 10 full unlabeled one-cubic yard cardboard containers of broken unleaded panel glass (photos 3, 4, 7, 8, 13, 14, and 18).

- Broken glass (clear and dark) on the concrete floor throughout the Warehouse (Glass Area and Commodity Area) (photos 2, 4, 10-15, 26, and 28). Mr. Gutierrez was not aware of the length of time of accumulation of the broken glass on the concrete floor. He stated that the broken glass would be swept up, managed as lead glass, and stored in one-cubic yard cardboard containers along with broken lead funnel glass.

C. Outside Dock

Located on the outside dock (at least 20 feet wide by 25 feet long), I observed:

- An estimate of 96 full one-cubic yard cardboard containers of broken lead funnel glass, broken unleaded panel glass, and electronics (non-flat screen televisions, flat screen televisions, computer monitors, radios, etc.) (photos 33-38). None of the containers appeared to be labeled. Due to the lack of aisle space and safety considerations, I could not visually inspect the condition and contents of each container. Mr. Gutierrez stated that the containers had been on-site since August/September 2016 and they were removed from the closed 3313 Northbrook Drive location. Mr. Gutierrez stated that there was no room inside the Warehouse to store the 96 one-cubic yard cardboard containers.

    - Out of the 96 one-cubic yard containers, I observed one full one-cubic yard cardboard container storing broken clear and dark glass (photo 34). The container was unlabeled and it had a hole (an estimate of 10-inches wide and one-foot long) at the bottom. The container appeared to release at least six 5 to 6-inch chards of broken clear and dark glass on the concrete dock. I asked Mr. Gutierrez if the container stored broken lead funnel glass and unleaded panel glass. Mr. Gutierrez stated that the container stored unleaded panel glass only.

    - Out of the 96 one-cubic yard containers, I observed one unlabeled half-full one-cubic yard cardboard container storing broken dark glass (photos 35, 36, and 58). The open container spilled a 2 by 6-foot long release of dark glass on the dirt ground in front of the dock.

- Broken glass (clear and dark) located throughout the dock's concrete pad (photos 32 and 33).

D. West of the dock

Located west of the dock, I observed:

- One 50-foot long pile (estimate of four-feet high) of televisions (non-flat screen and flat screen) and computer monitors on the ground (photos 59-62). I did not observe any broken glass in this area. Mr. Rochester stated that the pile had been accumulated for at least four to five weeks.

E. East of the dock

Located east of the dock, I observed:

- One 100-foot long pile (a minimum at least three feet high) of non-flat screen televisions and computer monitors (photos 37-57). The pile contained a minimum of 50 one-cubic yard containers of crushed glass (clear and dark), intact CRTs, broken CRTs, and electronics. Due to the lack of aisle space and safety considerations, I could not visually inspect the condition and contents of each container. Mr. Gutierrez stated that he did not know the exact date of accumulation of the pile and it possibly had been on-site for four to five weeks.

    - In the pile, I observed two full one-cubic yard containers of broken CRTs (photos 43-46). These containers were open and unlabeled. Mr. Rochester stated that that two containers stored broken CRTs.

    - In the pile, I observed one full one-cubic yard container of broken glass and one broken CRT (photo 57). The container was open, unlabeled, and filled with snow.

    - In the pile, I observed one 12 by 12-foot long release of broken clear and dark glass on the dirt ground (photos 41 and 47).

    - In the pile, I observed 60 to 75 silver-tip fluorescent lamps (four and six-foot-long) (photos 48-55). The lamps appeared to be spent and 75% of the lamps were broken. The broken lamp pieces were accumulated on the dirt ground. Mr. Gutierrez stated that lamps had been on-site for two to four weeks and they were dropped off by SW Recycling (Wilmer, Minnesota). I asked Mr. Gutierrez if the Recycletronics recycles spent fluorescent lamps. Mr. Gutierrez stated, "No." I asked Mr. Gutierrez if the lamps were hazardous waste. Mr. Gutierrez stated that he did not know. I asked Mr. Gutierrez if he had conduct a hazardous waste determination on the lamps. Mr. Gutierrez stated, "No."

4.5 Letter of Warning/Request for Information

Prior to the completion of the inspection, Ms. Wenner provided Mr. Rochester with a Letter of Warning/Request for Information (attachment 2) and read each line item on the letter to him.

Responding to the Ms. Wenner, Mr. Rochester stated:

- He is the owner of Recycletronics and the facility's address is 1220 Steuben Street, Sioux City, Iowa 51105.

- Recycletronics begin operations at the 1220 Steuben Street location during September 2016 and the facility is staffed by five employees.

- Waste Management is the property owner of the 1220 Steuben Street location.

- The property owner of 3313 Northbrook Drive, Sioux City, Iowa 51105 is Dan Henderson.

- Operations at the 3313 Northbrook Drive location began January/February 2013 and operations ceased at the location during September 2016.

- During Summer 2015 to October 2015, Recycletronics crushed lead funnel glass and unleaded panel glass with skid loaders at the 1313 11th Street location and self-transported the crushed glass to 2301 G Street, Sioux City, Nebraska 68766. The crushed glass is the property of Dennis Benson (Benson Brothers Construction) and Mr. Benson planned to manufacture concrete blocks from the crushed glass. D.A. Davis is the property owner of 2301 G Street, Sioux City, Nebraska 68766. Recycletronics does not operate at 2301 G Street, Sioux City, Nebraska 68766.

4.6 Drive-By Inspection - 3313 Northbrook Drive, Sioux City, Iowa 51105

On December 13, 2016, at 3:40 p.m., Ms. Wenner and I conducted a drive-by inspection at 3313 Northbrook Drive, Sioux City, Iowa 51105 (photo 63). In front of the building, I observed a for sale sign by Chris Bogenrief (NAI United – 712-204-6261). I observed no equipment, electronics, or CRTs stored outside the building.

4.7 Drive-By Inspection - 1313 11th Street, Suite D, Sioux City, Iowa 51105

On December 13, 2016, at 3:47 p.m., Ms. Wenner and I conducted a drive-by inspection at 1313 11th Street, Suite D, Sioux City, Iowa 51105 (photo 64). During the drive-by inspection, I observed building signage for Dadant Bee Supply. I observed no equipment, electronic waste, or CRTs stored outside the building.

4.8 Drive-By Inspection - 2301 G Street, Sioux City, Nebraska 68766

On December 13, 2016, at 4:01 p.m., Ms. Wenner and I conducted a drive-by inspection at 2301 G Street, Sioux City, Nebraska 68766. At the site, I observed a large pile of crushed glass stored on a concrete pad. The pile (estimate of 40 by 100-feet long) was covered with a plastic tarp and was enclosed by full and unlabeled 275-gallon plastic totes of crushed glass (photos 65-74). From the right-of-way, I observed 13 totes south and 30 totes west surrounding the pile. On top of the plastic tarp, I observed rubber tires, wooden pallets, and at least nineteen full 275-gallon plastic totes of crushed glass.

5.0 SUMMARY

At the time of the inspection, a *Notice of Violation* form was not provided to Mr. Rochester. Further EPA review will be needed to determine if violations of RCRA had occurred.

Michael J. Martin
Physical Scientist
Date: February 3, 2017

Attachments

1) *Region 7 Multi-Media Screening Checklist* (3 pages)
2) Letter of Warning/Request for Information (9 pages)
3) Facility Map (1 page)
4) *Confidentiality Notice* (1 page)
5) *Receipt for Documents and Samples* (1 page)
6) EPA RCRA Handler Information Report (2 pages)
7) Universal Waste Label (1 page)
8) 2010 L.P. Gill, Incorporated Correspondence (1 page)

Photo Log (8 pages)
Photographs (38 pages/74 photos)

Forward To: EPCRA / RMP / TSCA ☑ CWA ☐ Wetlands ☐ UIC ☐ PWS ☐ CAA ☐ RCRA ☑ UST ☐ SPCC ☐

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: Recycletronics Inspector Michael J. Martin

Facility Ownership: Aaron Rochester Primary Media: RCRA

Street: 1220 Steuben Street Inspector Phone Ext.: 7149

City: Sioux City State: IA Zip: 51105 Date: 12/13/2016

Phone: (712) 224-3158 Facility Contact: Aaron Rochester SIC/NAICS Code 562920

Number of Employees: 5 Work Hours/Shifts 7a-4:30p, Tue-Fri. Facility Subject to OSHA regulations Yes ☐ No ☐

Main facility activity, major process chemical(s) & description: Electronics Recycler.

(**Check all that apply**): painting/coating (water-based ☐, solvent-based ☐), printing ☐, reacting ☐ , formulating ☐, distilling ☐, water treatment ☐, refrigeration ☐, manufacturing ☐, parts washers/degreasing (water-based ☐, halogenated-based ☐, non-halogenated-based ☐), combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐ , other_____).

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☐ No ☑ ***Forward to EPCRA***

2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☑ (stop) Yes ☐ ***Forward to EPCRA***

3. Has the facility: ***If any box in question 3 is marked - Forward to EPCRA***

   a. Stored ≥500 lbs of ammonia ☐, ≥100 lbs of chlorine ☐, or ≥10,000 lbs of an industrial chemical ☐, at any time over the last 2 years? ☐

   b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐

   c. Used ≥10,000 lbs of ammonia ☐, chlorine ☐, halogenated solvents ☐, solvent-based paints ☐, or solvents ☐, or nitrated compound, over the last calendar year? ☐

   d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐

4. Does the facility have any oil filled electrical equipment No ☑ (stop) Yes ☐ ***Forward to PCB and ask*** Has facility tested oil filled equipment to determine PCB content; No ☐ Yes ☐ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ – ***Get Photo***

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any water/wastewater to storm sewers, surface water, or the land? No ☑ (stop) Yes ☐

If yes, are all water/wastewater discharges permitted? Yes ☐ No ☐ ***Forward to CWA***

2. Does the facility have process wastewaters that are discharged to a Municipal Wastewater Treatment Plant? No ☑ (stop) Yes ☐

   If yes, are the discharges permitted by: State? ☐ , City? ☐ – If yes, Stop here. No ☐ ***Forward to CWA***

   If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ ***Forward to CWA***

3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☑ (stop) Yes ☐

   If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ ***Forward to CWA***

4. Did you see any water/wastewater discharges not identified by the facility? No ☑ (stop) Yes ☐ - Identify location, time, appearance of discharge:

_____ (***Get Photo***) ***Forward to CWA***

5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☑ (stop) Yes ☐

   If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years? No ☐ (stop) Yes ☐ - Identify location and timeframe_____ (***Get Photo***) ***FWD to Wetlands***

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☑ (stop) Yes ☐ ***Forward to UIC***

   If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐

2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc)? No ☑ (stop) Yes ☐ ***Forward to PWS***

   If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA)

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☑ Yes ☐ ***Forward to CAA***

   Source_____ (***Get Photo***)

2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☑ (stop) Yes ☐

   If yes, is equipment permitted? Yes ☐ No ☐ ***Forward to CAA*** *Describe:*_____

   _____

3. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia ? No ☑ (stop) Yes ☐ ***Forward to EPCRA/RMP***

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☑ (stop) Yes ☐

   If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ ***Forward to RCRA***

2. Is hazardous waste treated ☐ , stored >90-days ☐, burned ☐ , land filled ☐ , put in surface impoundments ☐ or waste piles ☐ ?

   No ☑ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ ***Forward to RCRA***

3. Did you see or does the facility have any large quantities of materials **that the facility is accumulating and claims to be non-hazardous waste material** (>10 drums, roll-offs, waste piles, etc. – exclude clean office trash, cardboard, & packaging type wastes)? No ☐ (stop) Yes ☑

Material Claimed To Be Non-Hazardous	**How does the facility know these wastes are non-hazardous?**
Broken TV panel glass	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☑ ***Forward to RCRA***
	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ ***Forward to RCRA***

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☑ Yes ☐ ***Forward to RCRA***

   Describe: _____ ***(Get Photo)***

5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☐ Yes ☑ ***Forward to RCRA***

   Describe: Broken glass (outside + inside the warehouse) + broken lamps outside. ***(Get Photo)***

6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☑ Yes ☐ ***Forward to RCRA &***

   EPCRA Describe: _____ ***(Get Photo)***

7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☑ Yes ☐ ***Forward to UST***

8. Does the facility have any underground fuel tanks for emergency generators? No ☑ Yes ☐ ***Forward to UST***

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?

   No ☑ (stop) Yes ☐ - Does the facility have a certified SPCC Plan? Yes ☐ No ☐ ***Forward to SPCC***

   If yes, are there secondary containment systems for the tanks? Yes ☐ No ☐ ***Forward to SPCC***

   If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☐ Yes ☐ ***(Get Photo)*** ***Forward to SPCC***

**** PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS***

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

DEC 0 8 2016

VIA HAND DELIVERY

Mr. Aron Rochester
Owner/President
Recycletronics
1304 46th Street
Sioux City, Iowa 51104

RE: Recycletronics
3313 Northbrook Drive
Sioux City, Iowa 51105

Recycletronics
1230 Steuben Street
Sioux City, Iowa 51105

Dear Mr. Rochester:

Letter of Warning/Request for Information

On June 16, 2015, and April 17, 2016, a representative of the U. S. Environmental Protection Agency inspected the Recycletronics facility located at 3313 Northbrook Drive (hereinafter "Northbrook Drive Facility"). These inspections were conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act. 42 U.S.C. § 6927. During each of these inspections you stated that the office computers were not working and therefore could not provide requested records. After each inspection, the EPA inspector requested that you submit the requested records. To date, those records have not been provided to the EPA.

On December 1, 2015, the EPA mailed Recycletronics a Letter of Warning/Request for Information issued pursuant to Section 3007 of RCRA. That certified letter was received by Recycletronics on February 22, 2016. The letter requested copies of the records requested during the inspections and additional information in order to determine Recycletronics' compliance with RCRA. To date, the EPA has not received a response to the Request for Information.

This current Letter of Warning/Request for Information incorporates many questions set forth in the December 1, 2015 letter. Therefore, there is no need for you to respond separately to the previous Letter of Warning.

Please note that Section 3008(g) of RCRA authorizes the EPA to pursue penalties for failing to respond adequately to requests for submissions of required information. The statutory maximum penalty has been adjusted for inflation and is $37,500 for violations that occurred from January 12, 2009, through November 2, 2015, and $70,117 for violations that occur after November 2, 2015. Additionally, Section 3008(a) authorizes the EPA to initiate a civil judicial or administrative enforcement action if you fail to respond to this Letter of Warning/Request for Information. The statutory maximum penalty for violations of Section 3008(a) has been adjusted for inflation and is $93,750 for each day of non-compliance.

As previously stated, my staff has reviewed the inspection reports and determined that violations of RCRA were documented. The EPA is requesting additional information regarding the compliance status of the facilities cited above. Enclosed is a list of violations followed by a list of questions and/or requested information. Also enclosed are instructions to be used in providing your response. Please carefully read and follow these instructions. Your response to this request in accordance with the instructions is required by Section 3007 of RCRA and substantial penalties may result from not complying. Please note that the EPA reserves its right to pursue appropriate enforcement actions, including penalties, for failing to respond to the December 1, 2015 letter, this current request for information, and violations discovered as a result of these inspections, regardless of whether the violations were subsequently corrected.

Within 30 calendar days of receiving this letter, please mail your response to: Rebecca Wenner, U. S. Environmental Protection Agency, 11201 Renner Boulevard, Lenexa, Kansas 66219. To request an extension of the time limit, follow the instructions in the enclosure. Please direct all questions to Rebecca Wenner, of my staff, at (913) 551-7644.

Sincerely,

Mary Goetz
Chief
Waste Enforcement and Materials Management Branch
Air and Waste Management Division

Enclosures (3)

cc: Amie Davidson, Supervisor, Contaminated Sites Section
Iowa Department of Natural Resources
Bill Gidley, NDEQ
Susan Johnson, Quality Bureau-Solid Waste, IDNR

List of Violations
Recycletronics
Sioux City, Iowa

1. Title 40 Code of Federal Regulations § 262.34(a)(4) referencing 40 CFR § 265.31 – Failure to manage a facility to minimize the possibility of a release.
   a. During the July 16, 2015, inspection of the Northbrook Drive Facility, the inspector observed containers of electronic equipment which were stored outdoors while waiting to be processed. Photographic documentation shows these containers were open, in poor condition, and not weatherproofed. Additionally, photographic documentation shows the containers were overflowing. Broken plastic and metal scrap was observed on the concrete pad and the unpaved ground around these containers.

2. 40 CFR § 262.11 – Failure to perform a hazardous waste determination. In order to take advantage of the conditional exclusion from the definition of solid waste, used, broken cathode ray tubes and processed CRT glass undergoing recycling must be managed according to specific conditions. Specifically, the following condition was not met: intentionally breaking intact CRTs or further breaking or separating broken CRTs and sorting or otherwise managing glass removed from CRT monitors within a building with a roof, floor, and walls. 40 CFR § 261.39(b)(2)(i).
   a. During the July 16, 2015, and the May 23, 2016, inspections of the Northbrook Drive Facility, the inspector observed containers of electronic equipment which had been received and were being stored outdoors while waiting to be processed. These containers were open, in poor condition, and were not weatherproof. Additionally, photographic documentation shows the containers were overflowing on the ground.

List of Requested Information
Recycletronics
Sioux City, Iowa

1. Provide the following information about Recycletronics:
    a. Identify the current owner of Recycletronics and provide a current mailing address.
    b. Identify the legal status of Recycletronics (i.e. corporation, LLC, no legal status) along with relevant information as appropriate (i.e. legal name, state of incorporation, date of incorporation, registered agent).

2. Provide the following information about the Northbrook Drive Facility:
    a. Provide the name and address of the property owner.
    b. Provide the date, or approximate date, when Recycletronics' operations began at the Northbrook Drive Facility.
    c. Provide the current number of employees at the Northbrook Drive Facility.
    d. If Recycletronics' operations have ceased at this facility, provide the date that operations ended and current status of the Northbrook Drive Facility.

3. Provide the following information about the Steuben Facility:
    a. Provide the name and address of the property owner.
    b. Provide the date or approximate date when Recycletronics' operations began at the Steuben Facility.
    c. Provide the current number of Recycletronics employees at the Steuben Facility.
    d. If Recycletronics' operations have ceased at this facility, provide the date that operations ended and current status of the Steuben Facility.

4. Provide the following information about materials delivered to 2301 G Street, South Sioux City, Nebraska:
    a. Describe whether any materials processed at the Northbrook Drive Facility have been delivered or moved to 2301 G. Street, South Sioux City, Nebraska.
    b. If any materials have been delivered or moved to the G Street facility provide all invoices or bills of lading documenting those sales or movements.
    c. If materials have been delivered or moved to the G Street facility, explain when such activities began and the purpose of these shipments (i.e. storage, further processing).
    d. Identify your contact for this facility including name, current address, and title.
    e. If materials have been delivered or moved to the G Street facility, but are no longer being shipped there, identify when those activities ceased.
    f. Explain any other business relations between Recycletronics, or Aron Rochester, and this facility.

5. Provide the following information for any additional sites where Recycletronics has operated since 2013, or where Recycletronics currently operates:
    a. Identify the address.
    b. Provide the name and address of the property owner.
    c. Explain the operations performed at each property identified in question 5.a.
    d. Provide the date, or approximate date, when operations began at each additional property.
    e. Provide the current number of employees at each property.
    f. If operations have ceased at any of the properties identified above, provide the date that operations ended and current status of each property.

6. During the Northbrook Drive inspections, the inspectors observed unprocessed and processed materials stored outdoors in containers that were open, not weather resistant, and in poor condition. Inspectors also observed broken pieces of plastic and metal on the ground at the Northbrook Drive Facility. Please describe:
    a. The steps you have taken to minimize the possibility of a release of hazardous waste and/or hazardous constituents from the Northbrook Drive Facility.
    b. The steps you have taken to comply with the requirement to process incoming CRTs and manage all glass removed from CRTs inside a building with a roof, floor, and walls to correct Violations 1 and 2.

7. Provide a thorough description of the recycling activities/processes at The Northbrook Drive Facility and Steuben Facility. For each of these facilities, provide:
    a. A map/layout to designate the location where each process occurs.
    b. The maximum capacity of CRTs that can be processed in a day (i.e. number of units or pounds of CRTs and/or CRT components).
    c. A detailed description outlining how the glass (leaded and unleaded glass) parts are separated from the non-glass portions (i.e., scrap plastic scrap metal, etc.) of the equipment.
    d. A detailed description of how the leaded glass is separated from the unleaded glass.
    e. A description of how LCDs are handled and processed from receipt until they leave the facility (both intact and as processed parts). Include a description of any changes to the procedure if the LCDs are received broken and/or if they are broken during handling or processing. The descriptions should include a discussion of how items are evaluated for mercury releases and how mercury spills are managed, as well as how any mercury contaminated items are disposed.
    f. A description of how televisions potentially containing polychlorinated biphenyls are handled and processed from receipt until they leave the facility (both intact and as processed parts). Include a description of how any part or items potentially containing PCBs are managed on-site and how and where they are sent for disposal.

8. During the June 16, 2015 inspection at the Northbrook Drive Facility, you stated that unleaded glass debris was sent to Gill Hauling of Sioux City, Iowa to be used as aggregate or fill. Please provide the following information regarding that statement:
    a. List the amount of unleaded glass, with supporting documentation, Recycletronics sent to Gill Hauling of Sioux City, Iowa, each year from 2013 to the present.
    b. State whether a special waste or any other permit was required by the State of Iowa or the local government for the use of unleaded glass as aggregate or fill. If a special waste or other permit was required, please provide documentation that the unleaded glass was appropriately used in accordance with any issued permits, and include a copy of the permit.
    c. Provide a complete list, with supporting document, of any other items sent to Gill Hauling for use, reuse, recycling, disposal, or any other purpose.

9. The federal regulations state that intact CRTs as defined by 40 CFR § 260.10 are not solid wastes within the United States unless they are disposed and/or speculatively accumulated as defined in 40 CFR § 261.1(c)(8) by CRT collectors or glass processors. 40 CFR § 261.4(a)(22)(i). The federal regulations also state that glass removed from CRTs is not a solid waste provided it meets the requirements of 40 CFR § 261.39(c). 40 CFR § 261.4(a)(22)(iv). The regulations at 40 CFR § 261.39(c) state that processed CRT glass sent to a CRT glass manufacturer or a lead smelter after processing is not a solid waste unless it is speculatively accumulated as defined in 40 CFR § 261.1(c)(8).

   If Recycletronics is claiming that its CRTs and the glass removed from CRTs are not solid waste, it must provide the calculations and supporting documentation to demonstrate that Recycletronics was not speculatively accumulating either waste stream (i.e. CRTs and Glass removed from CRTs). Please provide a thorough accounting, with supporting documentation, demonstrating how Recycletronics met the conditional exclusion for CRTs in calendar year 2015. The accounting should include, at a minimum, a detailed description, with supporting documentation, of the calculation showing that Recycletronics recycled at least 75 percent by weight or volume of the amount of material accumulated at the beginning of the period (January 1, 2015).

10. Please provide the following information regarding your current operations:
    a. Provide a thorough description with supporting documentation on how Recycletronics is currently managing CRT materials on site at the Northbrook Facility and Steuben Facility.
    b. Include a description on how Recycletronics is currently documenting incoming materials, including, but not limited to photographic documentation showing the date accumulation for each storage unit, or a legible copy of Recycletronics' inventory log or other appropriate method for documentation.
    c. Provide documentation showing how incoming materials are treated as a commodity and that there is a current market for these processed materials.

3007 RESPONSE INSTRUCTIONS

* Identify the Person(s) responding to this request on your behalf.

* Address each numbered item separately, and precede each answer with the number of the item to which it responds.

* For each numbered item, identify all documents consulted, examined, or referred to in the preparation of the answer, or that contain information responsive to the requested item. Provide true, accurate, and legible copies of all such documents. (If information responsive to an item is available but there are no relevant source documents, you must still provide the information.)

* For each document provided, indicate on the document (or in some similar manner) the number of the item to which it responds.

* For each numbered item, identify all persons consulted in the preparation of the answer.

* For purposes of this request, the term "you" or "your" refers to the company, corporation and any officer, principal, agent employee, or any other person(s) associated in any capacity.

* If information responsive to a requested item is not in your possession, identify the person(s) from whom the information may be obtained.

* If information that is not known or available at the time you make your response later becomes known or available to you, you must supplement your response.

* If, at any time after you submit your response, you find that any part of the information you submitted is incomplete, false, or misrepresents the truth, you must notify the EPA immediately.

* You must provide the requested information even though you consider it confidential information or trade secrets. If you want to make a confidentiality claim covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential."

* The EPA will disclose this information only to the extent and by the means described in 40 CFR Part 2, Subpart B., provided that it qualifies as confidential business information.

* A request for an extension to the time limit for responding must be in writing and must be postmarked within five (5) calendar days of receipt of this information request. Address it to the person identified in the cover letter to receive your response.

* Copies of the Code of Federal Regulations may be obtained from the U.S. Government Bookstores or on the Internet at www.epa.gov/epahome/cfr40.htm.

* This request for information is not subject to the approval requirements of the Paperwork Reduction Act of 1980.

* The EPA encourages you to conserve resources. Suggested methods include use of recycled paper, printing on both sides (duplex printing), and when possible submitting documents electronically (i.e., email or compact discs). If hard copy submittals are necessary, please do not submit documents in binders.

Not responding to this information request within the stated time limit and in accordance with these instructions may subject your facility to an enforcement action which could include the imposition of penalties up to $93,750 per violation, per day of continued noncompliance. Providing false, fictitious or fraudulent statements or representation could lead to criminal penalties.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Letter of Warning/Request for Information issued pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6927, was hand delivered on _____

to_____.

_____
Name

_____
Title

_____
Date

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Letter of Warning/Request for Information issued pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6927, was hand delivered on December 13, 2016 to Aaron Rochester.

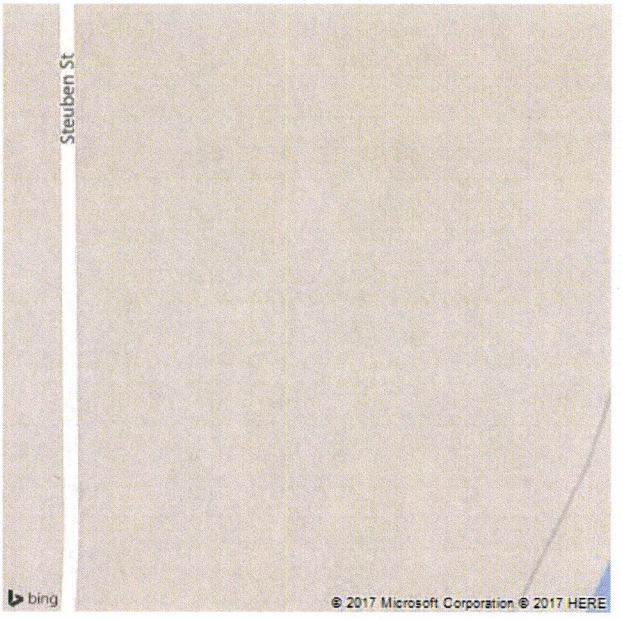
Rebecca Warner
Name

Life Scientist
Title

12/13/2016
Date

bing maps

Notes



Reactelectronics
1220 Steuben Street
Sioux City, Iowa 51105

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name: Rardetonics	
Facility Address: 1220 Stadium Street Sioux City Iowa 51103	
Inspector (print): Michael J. Martin	
U.S. EPA, Region 7, 11201 Renner Blvd., Lenexa, KS 66219	Date 12/13/2016

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. No statute specifically requires disclosure of the information.

3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and DO NOT want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date
Aaron Rardetter	12/13/16

I have received this Notice and DO want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

(Rev: 7/1/14) White Original / EPA • Yellow / Facility

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name
Readerboards
Facility Address
1220 Steuben Street Sioux City, Iowa 51105

Documents Collected? YES ✓ (list below) NO _____

Samples Collected? YES _____ (list below) NO ✓ Split Samples: YES _____ NO _____

Documents/ Samples were: 1) Received no charge ✓ 2) Borrowed _____ 3) Purchased_____

Amount Paid: $_____ Method: Cash _____ Voucher _____ To Be Billed _____

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

1) Universal Waste Label (1 page)
2) LPGill Correspondence (6 pages)

Facility Representative (print)	Signature/Date
Aaron Rochester	12/13/16
Inspector (print)	Signature/Date
Michael J. Martin	12/13/2016
U.S. EPA, Region 7, 11201 Renner Blvd., Lenexa, KS 66219	

(Rev: 7/14/14)

White Original / EPA • Yellow / Facility

Hazardous Waste Site Info Verification Report for Inspector

December 7, 2016

PROCEDURES for Inspectors/Investigators/etc. performing Site Visits:
Present the Facility representative with a copy of their Site Info Verification Report (Iowa facilities only).

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to Elizabeth Koesterer, AWMD/WEMM.

Our instructions to them are printed on their Site Info Verification Report, and should be self explanatory. If the Iowa facility wants to revise their Site Info Verification Report, they can do so and mail it back to EPA R7, or have the inspector deliver it.

If a Kansas, Missouri or Nebraska facility wants to change their information, they must fill out a RCRA Subtitle C Site Identification Form (or equivalent State form) and mail it to the appropriate State.

EPA RCRA ID Number: [redacted] **- ADMINISTRATIVE ID NUMBER - DO NOT RELEASE**

Exemption 2

Name of Company/Site: **RECYCLETRONICS - ADMINISTRATIVE ID# - DO NOT RELEASE**

Location of Site: ~~3313 NORTHBROOK DR~~ MN 12/13/16 1220 Steuben Street
SIOUX CITY, IA 51105
WOODBURY County

Land Type: Private

NAICS: 562920 - MATERIALS RECOVERY FACILITIES

Mailing Address: ~~3313 NORTHBROOK DR~~ MN 12/13/16 1220 Steuben Street
SIOUX CITY, IA 51105

Site Contact: AARON ROCHESTER 12/13/16
Job Title: OWNER
Address: ~~3313 NORTHBROOK DR~~ MN 1220 Steuben Street
SIOUX CITY, IA 51105
Email: RECYCLETRONICSGM@CABLEONE.COM
Phone Number: 712-224-3158

Current Owner of Site: ~~RAINTREE PROPERTIES~~ Waste Management 20520 Keokuk Ave. Suite 200 Lakeville, MN 55044
Owner Type: Private

Current Operator of Site: RECYCLETRONICS
Phone Number: 712-224-3158
Operator Type: Private

TYPE(S) OF REGULATED ACTIVITY: None

Date of Site Visit: 12/13/2016
Name of Inspector (Please print): Michael J. Martin
(Check one): [✓] EPA R7 ENST [ ] EPA R7 Contractor [ ] NOWCC/SEE Investigator
Signature of Inspector/Investigator: Michael J. Martin

Hazardous Waste Site Info Verification Report for Inspector

December 7, 2016

PROCEDURES for Inspectors/Investigators/etc. performing Site Visits:
Present the Facility representative with a copy of their Site Info Verification Report (Iowa facilities only).

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to Elizabeth Koesterer, AWMD/WEMM.

Our instructions to them are printed on their Site Info Verification Report, and should be self explanatory. If the Iowa facility wants to revise their Site Info Verification Report, they can do so and mail it back to EPA R7, or have the inspector deliver it.

If a Kansas, Missouri or Nebraska facility wants to change their information, they must fill out a RCRA Subtitle C Site Identification Form (or equivalent State form) and mail it to the appropriate State.

Hazardous Wastes Handled:

I 07/06/15 N

Certified by State/EPA on 07/06/15 by
HEATHER K WOOD 06/16/15
EPA R7 CONTRACTOR

Date of Site Visit: 12/13/2016
Name of Inspector (Please print): Michael S. Martin
(Check one): [✓] EPA R7 ENST [ ] EPA R7 Contractor [ ] NOWCC/SEE Investigator
Signature of Inspector/Investigator: Michael Martin

UNIVERSAL WASTE

CONTENTS _____

_____

ACCUMULATION START DATE _____

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

L.P. GILL, INC.

LICENSED PRIVATE LANDFILL
REFUSE SERVICE
Phone (402) 632-4238
Box 126
Jackson, Nebraska 68743

November 12, 2010

To Whom It May Concern:

Attached is the analytical report on the unleaded glass being produced at Recycletronics located at 301 West 7th Street in Sioux City, Iowa.

This glass material will be used as a bedding material for piping involving the collection of methane gas at the L. P. Gill, Inc. landfill located at Jackson, NE. This material will take the place of native rock that we normally buy from Higman Sand & Gravel at Hawarden, Iowa.

The Test American Analytical Report will be kept on file at the L. P. Gill, Inc. landfill office for review by the Nebraska Dept of Environmental Control personnel.

Signed,

L P Gill

Leonard P. Gill, President
L. P. Gill, Inc.

PHOTO LOG

Facility Name/City: Recycletronics, 1220 Steuben Street, Sioux City, Iowa 51105
Facility ID #: None
Date: December 13, 2016
Photographer: Michael J. Martin
Type of Camera: Nikon Coolpix S8000, Serial #: 41155876
Digital Recording Media: Flashcard
All digital photos were copied by: Michael J. Martin on February 2, 2017.
All digital photos were copied to: CD-R
Original copy is stored in: CD-R Digital photos were downloaded to CD-R by Michael J. Martin. No changes were made in the original image files prior to storage on the CD-R.

Report Photo#	Photographer	Date	Approx. Time	File Name (DSCNxxxx.jpg)	Description
1	Michael J. Martin	12/13/2016	11:14 AM	1244	Photo of one full 1-cubic yard cardboard container of broken lead funnel glass (broken lead funnel glass) labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" and "Do Not Mix with Other Glass Material" located at the Glass Area (Warehouse). Photo taken facing north.
2	Michael J. Martin	12/13/2016	11:15 AM	1245	Photo of broken glass (clear and dark) located on the concrete floor in the Glass Area (Warehouse). Photo taken facing north.
3	Michael J. Martin	12/13/2016	11:15 AM	1246	Photo of four 1-cubic yard containers of broken unleaded panel class located at the Glass Area (Warehouse). Photo taken facing northeast.
4	Michael J. Martin	12/13/2016	11:15 AM	1247	Same containers in Photo 3 (red arrows) and two full 1-cubic yard cardboard containers of broken/intact CRTs labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" and "Do Not Mix with Other Glass Material" (right - green arrows) located at the Glass Area (Warehouse). Photo taken facing northeast.

5	Michael J. Martin	12/13/2016	11:16 AM	1248	Photo of a "Universal Waste" label stored on top of one 1-cubic yard cardboard container of broken unleaded panel glass located at the Glass Area (Warehouse). Photo taken facing north.
6	Michael J. Martin	12/13/2016	11:16 AM	1249	Same image as Photo 5. Photo taken facing north.
7	Michael J. Martin	12/13/2016	11:19 AM	1250	Photo of one cubic yard container of broken lead funnel glass (broken funnel glass) labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" (green arrow), one cubic yard container of circuit boards (yellow arrow), and four cubic yard containers of broken unleaded panel glass (red arrows) located at the Warehouse. Photo taken facing southeast.
8	Michael J. Martin	12/13/2016	11:19 AM	1251	Photo of two 1-cubic yard containers of circuit boards (yellow arrows) and one cubic yard container of broken unleaded panel glass (red arrow) located at the Warehouse. Photo taken facing southeast.
9	Michael J. Martin	12/13/2016	11:22 AM	1252	Photo of three full 1-cubic yard cardboard containers of broken/intact CRTs labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" and "Do Not Mix with Other Glass Material" located at the Glass Area (Warehouse). Photo taken facing northeast.
10	Michael J. Martin	12/13/2016	11:24 AM	1253	Photo of broken glass (clear and dark) located on the concrete floor in the Glass Area (Warehouse). Photo taken facing northeast.
11	Michael J. Martin	12/13/2016	11:25 AM	1254	Photo of broken glass (clear and dark) located on the concrete floor in the Glass Area (Warehouse). Photo taken facing northeast.
12	Michael J. Martin	12/13/2016	11:25 AM	1255	Photo of broken glass (clear and dark) located on the concrete floor in the Glass Area (Warehouse). Photo taken facing east.

13	Michael J. Martin	12/13/2016	11:34 AM	1256	Photo of 10 one-cubic yard cardboard containers of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Open and unlabeled one-cubic yard container of unleaded panel glass (red arrow). Photo taken facing east.
14	Michael J. Martin	12/13/2016	11:34 AM	1257	Photo of one open cubic yard container of unleaded panel glass (same container in Photo 13), broken glass (clear and dark) on the floor, and debris located at the Warehouse. Photo taken facing east.
15	Michael J. Martin	12/13/2016	11:34 AM	1258	Same image as Photo 14. Photo taken facing east.
16	Michael J. Martin	12/13/2016	11:34 AM	1259	Photo of 22 one-cubic yard cardboard containers of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing west.
17	Michael J. Martin	12/13/2016	11:34 AM	1260	Photo of 12 one-cubic yard cardboard containers of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing south.
18	Michael J. Martin	12/13/2016	11:35 AM	1261	Photo of 4 one-cubic yard cardboard containers of broken unleaded panel glass located at the Warehouse. Photo taken facing south.
19	Michael J. Martin	12/13/2016	11:35 AM	1262	Photo of four rows of one-cubic yard cardboard containers (double stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing east.
20	Michael J. Martin	12/13/2016	11:35 AM	1263	Photo of three rows of one-cubic yard cardboard containers (double stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing east.

21	Michael J. Martin	12/13/2016	11:35 AM	1264	Photo of three rows of one-cubic yard cardboard containers (double stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. One full one-cubic yard cardboard container of broken lead funnel glass labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" and "Do Not Mix with Other Glass Material" (green arrow). Photo taken facing east.
22	Michael J. Martin	12/13/2016	11:35 AM	1265	Photo of one one-cubic yard cardboard container of unprocessed electronics labeled with the words "Small TVs Only" located at the Warehouse. Photo taken facing south.
23	Michael J. Martin	12/13/2016	11:36 AM	1266	Photo of one full one-cubic yard cardboard container of broken lead funnel glass labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" and "Do Not Mix with Other Glass Material" located at the Warehouse. Photo taken facing south.
24	Michael J. Martin	12/13/2016	11:37 AM	1267	Photo of 12 one-cubic yard cardboard containers (double stacked or triple stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing northwest.
25	Michael J. Martin	12/13/2016	11:37 AM	1268	Photo of 10 one-cubic yard cardboard containers (double stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing west.
26	Michael J. Martin	12/13/2016	11:37 AM	1269	Same image as Photo 25. Photo taken facing west.

27	Michael J. Martin	12/13/2016	11:38 AM	1270	Photo of eight 1-cubic yard cardboard containers (double stacked) of broken lead funnel glass, broken unleaded panel glass, non-processed electronics, and one wooden pallet storing two intact CRTs (red arrow) located at the Warehouse. Photo taken facing south.
28	Michael J. Martin	12/13/2016	11:38 AM	1271	Photo of broken glass (clear and dark) located on the concrete floor in the Warehouse. Photo taken facing south.
29	Michael J. Martin	12/13/2016	11:39 AM	1272	Photo of six 1-cubic yard cardboard containers (double stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing south.
30	Michael J. Martin	12/13/2016	11:40 AM	1273	Photo of three rows of one-cubic yard cardboard containers (double stacked/triple stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing north.
31	Michael J. Martin	12/13/2016	11:40 AM	1274	Photo of eight 1-cubic yard cardboard containers (double stacked/triple stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing east.
32	Michael J. Martin	12/13/2016	11:41 AM	1275	Photo of broken glass (clear and dark) located on the concrete floor at the Dock. Photo taken facing southeast.
33	Michael J. Martin	12/13/2016	11:41 AM	1276	Photo of broken glass (clear and dark) located on the concrete floor and two 1-cubic yard cardboard containers of non-processed electronics located at the Dock. Photo taken facing north.
34	Michael J. Martin	12/13/2016	11:42 AM	1277	Photo of one 1-cubic yard cardboard container of broken glass (one 1-foot long hole at the bottom - released at least six 5 to 6-inch chards of broken clear and dark glass on the concrete dock) located at the Dock. Photo taken facing north.

35	Michael J. Martin	12/13/2016	11:45 AM	1278	Photo of 96 full one-cubic yard cardboard containers of broken lead funnel glass, broken unleaded panel glass, and electronics (TVs, computer monitors, radios, etc.) and one 2 by 6-foot long release of dark glass on the dirt ground (red arrow) located at the Dock. Photo taken facing north.
36	Michael J. Martin	12/13/2016	11:45 AM	1279	Same image as Photo 35. Photo taken facing northwest.
37	Michael J. Martin	12/13/2016	11:45 AM	1280	Photo of one 100-foot long pile of TVs, flat screens, and computer monitors located east of the Dock (The pile contained a minimum of 50 one-cubic yard containers of crushed glass, intact CRTs, broken CRTs, and used electronics) and 96 full one-cubic yard cardboard containers of broken lead funnel glass, broken unleaded panel glass, and electronics located on the Dock. Photo taken facing northwest.
38	Michael J. Martin	12/13/2016	11:45 AM	1281	Same image as Photo 37. Photo taken facing northwest.
39	Michael J. Martin	12/13/2016	11:46 AM	1282	Same image as Photo 37. Photo taken facing northwest.
40	Michael J. Martin	12/13/2016	11:47 AM	1283	Same image as Photo 37. Photo taken facing west.
41	Michael J. Martin	12/13/2016	11:47 AM	1284	Photo of one 12 by 12-foot long release of broken glass (clear and dark) glass on the ground (within the pile in Photo 37). Photo taken facing northwest.
42	Michael J. Martin	12/13/2016	11:47 AM	1285	Same image as Photo 37 and two 1-cubic yard containers of broken CRTs (red arrows – see photos 43-46). Photo taken facing west.
43	Michael J. Martin	12/13/2016	11:54 AM	1286	Photo of one full one-cubic yard container of broken CRTs (open and non-labeled) (within the pile in Photo 37). Photo taken facing west.
44	Michael J. Martin	12/13/2016	11:54 AM	1287	Same image as Photo 43. Photo taken facing south.

45	Michael J. Martin	12/13/2016	11:54 AM	1288	Photo of one full one-cubic yard container of broken CRTs (open and non-labeled) (within the pile in Photo 37). Photo taken facing north.
46	Michael J. Martin	12/13/2016	11:54 AM	1289	Same image as Photos 43 and 45. Photo taken facing north.
47	Michael J. Martin	12/13/2016	11:55 AM	1290	Same image as Photo 41. Photo taken facing northwest.
48	Michael J. Martin	12/13/2016	11:56 AM	1291	Photo of broken fluorescent lamps located on the ground (within the pile in Photo 37). Photo taken facing west.
49	Michael J. Martin	12/13/2016	11:57 AM	1292	Same image as Photo 48. Photo taken facing west.
50	Michael J. Martin	12/13/2016	11:57 AM	1293	Same image as Photo 48. Photo taken facing west.
51	Michael J. Martin	12/13/2016	11:57 AM	1294	Same image as Photo 48. Photo taken facing west.
52	Michael J. Martin	12/13/2016	11:59 AM	1295	Same image as Photo 48. Photo taken facing west.
53	Michael J. Martin	12/13/2016	11:59 AM	1296	Same image as Photo 48. Photo taken facing west.
54	Michael J. Martin	12/13/2016	12:00 PM	1297	Same image as Photo 48. Photo taken facing west.
55	Michael J. Martin	12/13/2016	12:02 PM	1298	Same image as Photo 48. Photo taken facing west.
56	Michael J. Martin	12/13/2016	12:03 PM	1299	Same image as Photo 37. Photo taken facing north.
57	Michael J. Martin	12/13/2016	12:05 PM	1300	Photo of one full one-cubic yard container of broken unleaded panel class and one broken CRT (within the pile in Photo 37). Photo taken facing north.
58	Michael J. Martin	12/13/2016	12:05 PM	1301	Photo of the 2 by 6-foot long release of dark glass on the dirt ground (same release in Photo 35) located at the Dock. Photo taken facing north.
59	Michael J. Martin	12/13/2016	12:06 PM	1302	Photo one 50-foot long pile (a minimum of four feet high) of TVs, flat screens, and computer monitors located west of the Dock. Photo taken facing north.
60	Michael J. Martin	12/13/2016	12:06 PM	1303	Same image as Photo 59. Photo taken facing northeast.
61	Michael J. Martin	12/13/2016	12:06 PM	1304	Same image as Photo 59. Photo taken facing northeast.

62	Michael J. Martin	12/13/2016	12:07 PM	1305	Same image as Photo 59. Photo taken facing north.
63	Michael J. Martin	12/13/2016	3:40 PM	1308	Photo of the building located at 3313 Northbrook Street, Sioux City, Iowa 51105. Photo taken facing north.
64	Michael J. Martin	12/13/2016	3:47 PM	1309	Photo of the building located at 1318 11th Street, Sioux City, Iowa 51105. Photo taken facing west.
65	Michael J. Martin	12/13/2016	4:01 PM	1310	Photo pile of the crushed mixed glass located at 2301 G Street, Sioux City, Nebraska 68766. Photo taken facing south.
66	Michael J. Martin	12/13/2016	4:01 PM	1311	Same image as Photo 65. Photo taken facing south.
67	Michael J. Martin	12/13/2016	4:02 PM	1312	Same image as Photo 65. Photo taken facing south.
68	Michael J. Martin	12/13/2016	4:02 PM	1313	Same image as Photo 65. Photo taken facing west.
69	Michael J. Martin	12/13/2016	4:03 PM	1314	Same image as Photo 65. Photo taken facing northwest.
70	Michael J. Martin	12/13/2016	4:03 PM	1315	Same image as Photo 65. Photo taken facing northwest.
71	Michael J. Martin	12/13/2016	4:04 PM	1316	Same image as Photo 65. Photo taken facing northwest.
72	Michael J. Martin	12/13/2016	4:04 PM	1317	Same image as Photo 65. Photo taken facing northwest.
73	Michael J. Martin	12/13/2016	4:10 PM	1318	Same image as Photo 65. Photo taken facing south.
74	Michael J. Martin	12/13/2016	4:10 PM	1319	Same image as Photo 65. Photo taken facing south.

Recycletronics
1220 Steuben Street
Sioux City, Iowa

1220 Steuben Street - Photos 1-62
3313 Northbrook Street - Photo 63
1318 11th Street - Photo 64
2301 G Street - Photos 65-74

RCRA Inspection Photos

Photos taken by Michael J. Martin

on December 13, 2016

Recycletronics
December 13, 2016

Photo of one full 1-cubic yard cardboard container of broken lead funnel glass (broken lead funnel glass) labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" and "Do Not Mix with Other Glass Material" located at the Glass Area (Warehouse). Photo taken facing north.

Photo 1 Michael J. Martin

Recycletronics
December 13, 2016

Photo of broken glass (clear and dark) located on the concrete floor in the Glass Area (Warehouse). Photo taken facing north.

Photo 2 Michael J. Martin

Recycletronics
December 13, 2016

Photo of four 1-cubic yard containers of broken unleaded panel class located at the Glass Area (Warehouse). Photo taken facing northeast.

Photo 3 Michael J. Martin MJM

Recycletronics
December 13, 2016

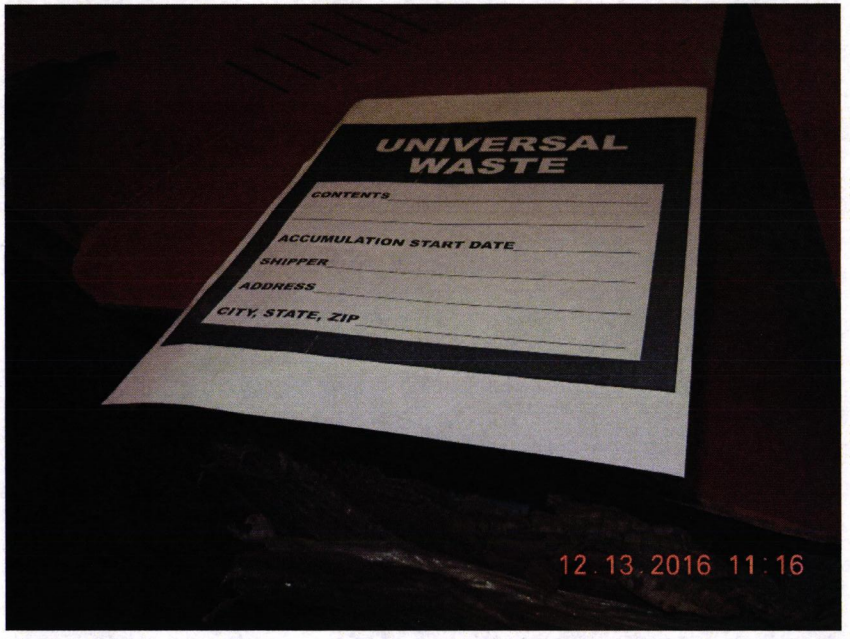
Same containers in Photo 3 (red arrows) and two full 1-cubic yard cardboard containers of broken/intact CRTs labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" and "Do Not Mix with Other Glass Material" (right - green arrows) located at the Glass Area (Warehouse). Photo taken facing northeast.

Photo 4 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of a "Universal Waste" label stored on top of one 1-cubic yard cardboard container of broken unleaded panel glass located at the Glass Area (Warehouse). Photo taken facing north.

Photo 5 Michael J. Martin



Recycletronics
December 13, 2016

Same image as Photo 5. Photo taken facing north.

Photo 6 Michael J. Martin

Recycletronics
December 13, 2016

Photo of one cubic yard container of broken lead funnel glass (broken funnel glass) labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" (green arrow), one cubic yard container of circuit boards (yellow arrow), and four cubic yard containers of broken unleaded panel glass (red arrows) located at the Warehouse. Photo taken facing southeast.

Photo 7 Michael J. Martin

Recycletronics
December 13, 2016

Photo of two 1-cubic yard containers of circuit boards (yellow arrows) and one cubic yard container of broken unleaded panel glass (red arrow) located at the Warehouse. Photo taken facing southeast.

Photo 8 Michael J. Martin

Recycletronics
December 13, 2016

Photo of three full 1-cubic yard cardboard containers of broken/intact CRTs labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" and "Do Not Mix with Other Glass Material" located at the Glass Area (Warehouse). Photo taken facing northeast.

Photo 9 Michael J. Martin

Recycletronics
December 13, 2016

Photo of broken glass (clear and dark) located on the concrete floor in the Glass Area (Warehouse). Photo taken facing northeast.

Photo 10 Michael J. Martin

Recycletronics
December 13, 2016

Photo of broken glass (clear and dark) located on the concrete floor in the Glass Area (Warehouse). Photo taken facing northeast.

Photo 11 Michael J. Martin

Recycletronics
December 13, 2016

Photo of broken glass (clear and dark) located on the concrete floor in the Glass Area (Warehouse). Photo taken facing east.

Photo 12 Michael J. Martin

Recycletronics
December 13, 2016

Photo of 10 one-cubic yard cardboard containers of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Open and unlabeled one-cubic yard container of unleaded panel glass (red arrow). Photo taken facing east.

Photo 13 Michael J. Martin

Recycletronics
December 13, 2016

Photo of one open cubic yard container of unleaded panel glass (same container in Photo 13), broken glass (clear and dark) on the floor, and debris located at the Warehouse. Photo taken facing east.

Photo 14 Michael J. Martin

Recycletronics
December 13, 2016

Same image as Photo 14. Photo taken facing east.

Photo 15 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of 22 one-cubic yard cardboard containers of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing west.

Photo 16 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of 12 one-cubic yard cardboard containers of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing south.

Photo 17 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of 4 one-cubic yard cardboard containers of broken unleaded panel glass located at the Warehouse. Photo taken facing south.

Photo 18 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of four rows of one-cubic yard cardboard containers (double stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing east.

Photo 19 Michael J. Martin

Recycletronics
December 13, 2016

Photo of three rows of one-cubic yard cardboard containers (double stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing east.

Photo 20 Michael J. Martin

Recycletronics
December 13, 2016

Photo of three rows of one-cubic yard cardboard containers (double stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. One full one-cubic yard cardboard container of broken lead funnel glass labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" and "Do Not Mix with Other Glass Material" (green arrow). Photo taken facing east.

Photo 21 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of one one-cubic yard cardboard container of unprocessed electronics labeled with the words "Small TVs Only" located at the Warehouse. Photo taken facing south.

Photo 22 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of one full one-cubic yard cardboard container of broken lead funnel glass labeled with the words "Used Cathode Ray Tubes - Contains Lead Glass" and "Do Not Mix with Other Glass Material" located at the Warehouse. Photo taken facing south.

Photo 23 Michael J. Martin

Recycletronics
December 13, 2016

Photo of 12 one-cubic yard cardboard containers (double stacked or triple stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing northwest.

Photo 24 Michael J. Martin

Recycletronics
December 13, 2016

Photo of 10 one-cubic yard cardboard containers (double stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing west.

Photo 25 Michael J. Martin MJM

Recycletronics
December 13, 2016

Same image as Photo 25. Photo taken facing west.

Photo 26 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of eight 1-cubic yard cardboard containers (double stacked) of broken lead funnel glass, broken unleaded panel glass, non-processed electronics, and one wooden pallet storing two intact CRTs (red arrow) located at the Warehouse. Photo taken facing south.

Photo 27 Michael J. Martin

Recycletronics
December 13, 2016

Photo of broken glass (clear and dark) on concrete floor in the Glass Area (Warehouse). Photo taken facing south.

Photo 28 Michael J. Martin

Recycletronics
December 13, 2016

Photo of six 1-cubic yard cardboard containers (double stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing south.

Photo 29 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of three rows of one-cubic yard cardboard containers (double stacked/triple stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing north.

Photo 30 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of eight 1-cubic yard cardboard containers (double stacked/triple stacked) of broken lead funnel glass, broken unleaded panel glass, and non-processed electronics located at the Warehouse. Photo taken facing east.

Photo 31 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of broken glass (clear and dark) located on the concrete floor at the Dock. Photo taken facing southeast.

Photo 32 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of broken glass (clear and dark) on concrete floor and two 1-cubic yard cardboard containers of non-processed electronics located at the Dock. Photo taken facing north.

Photo 33 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of one 1-cubic yard cardboard container of broken glass (one 1-foot long hole at the bottom - released at least six 5 to 6-inch chards of broken clear and dark glass on the concrete dock) located at the Dock. Photo taken facing north.

Photo 34 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of 96 full one-cubic yard cardboard containers of broken lead funnel glass, broken unleaded panel glass, and electronics (TVs, computer monitors, radios, etc.) and one 2 by 6-foot long release of dark glass on the dirt ground (red arrow) located at the Dock. Photo taken facing north.

Photo 35 Michael J. Martin MJM

Recycletronics
December 13, 2016

Same image as Photo 35. Photo taken facing northwest.

Photo 36 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of one 100-foot long pile of TVs, flat screens, and computer monitors located east of the Dock (The pile contained a minimum of 50 one-cubic yard containers of crushed glass, intact CRTs, broken CRTs, and used electronics) and 96 full one-cubic yard cardboard containers of broken lead funnel glass, broken unleaded panel glass, and electronics located on the Dock. Photo taken facing northwest.

Photo 37 Michael J. Martin MJM

Recycletronics
December 13, 2016

Same image as Photo 37. Photo taken facing northwest.

Photo 38 Michael J. Martin MJM

Recycletronics
December 13, 2016

Same image as Photo 37. Photo taken facing northwest.

Photo 39 Michael J. Martin MJM

Recycletronics
December 13, 2016

Same image as Photo 37. Photo taken facing west.

Photo 40 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of one 12 by 12-foot long release of broken glass (clear and dark) glass on the ground (within the pile in Photo 37). Photo taken facing northwest.

Photo 41 Michael J. Martin

Recycletronics
December 13, 2016

Same image as Photo 37 and two 1-cubic yard containers of broken CRTs (red arrows – see photos 43-46). Photo taken facing west.

Photo 42 Michael J. Martin

Recycletronics
December 13, 2016

Photo of one full one-cubic yard container of broken CRTs (open and non-labeled) (within the pile in Photo 37). Photo taken facing west.

Photo 43 Michael J. Martin MJM

Recycletronics
December 13, 2016

Same image as Photo 43. Photo taken facing south.

Photo 44 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of one full one-cubic yard container of broken CRTs (open and non-labeled) (within the pile in Photo 37). Photo taken facing north.

Photo 45 Michael J. Martin

Recycletronics
December 13, 2016

Same image as Photos 43 and 45. Photo taken facing north.

Photo 46 Michael J. Martin

Recycletronics
December 13, 2016

Same image as Photo 41. Photo taken facing northwest.

Photo 47 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of broken fluorescent lamps located on the ground (within the pile in Photo 37). Photo taken facing west.

Photo 48 Michael J. Martin MJM

Recycletronics
December 13, 2016

Same image as Photo 48. Photo taken facing west.

Photo 49 Michael J. Martin MJM

Recycletronics
December 13, 2016

Same image as Photo 48. Photo taken facing west.

Photo 50 Michael J. Martin MJM

Recycletronics
December 13, 2016

Same image as Photo 48. Photo taken facing west.

Photo 51 Michael J. Martin MJM

Recycletronics
December 13, 2016

Same image as Photo 48. Photo taken facing west.

Photo 52 Michael J. Martin MJM

Recycletronics
December 13, 2016

Same image as Photo 48. Photo taken facing west.

Photo 53 Michael J. Martin

Recycletronics
December 13, 2016

Same image as Photo 48. Photo taken facing west.

Photo 54 Michael J. Martin

Recycletronics
December 13, 2016

Same image as Photo 48. Photo taken facing west.

Photo 55 Michael J. Martin MJM

Recycletronics
December 13, 2016

Same image as Photo 37. Photo taken facing north.

Photo 56 Michael J. Martin MJM

Recycletronics
December 13, 2016

Photo of one full one-cubic yard container of broken unleaded panel class and one broken CRT (within the pile in Photo 37). Photo taken facing north.

Photo 57 Michael J. Martin

Recycletronics
December 13, 2016

Photo of the 2 by 6-foot long release of dark glass on the dirt ground (same release in Photo 35) located at the Dock. Photo taken facing north.

Photo 58 Michael J. Martin

Recycletronics
December 13, 2016

Photo one 50-foot long pile (a minimum of four feet high) of TVs, flat screens, and computer monitors located west of the Dock. Photo taken facing north.

Photo 59 Michael J. Martin

Recycletronics
December 13, 2016

Same image as Photo 59. Photo taken facing northeast.

Photo 60 Michael J. Martin

Recycletronics
December 13, 2016

Same image as Photo 59. Photo taken facing northeast.

Photo 61 Michael J. Martin

Recycletronics
December 13, 2016

Same image as Photo 59. Photo taken facing north.

Photo 62 Michael J. Martin

3313 Northbrook Street
December 13, 2016

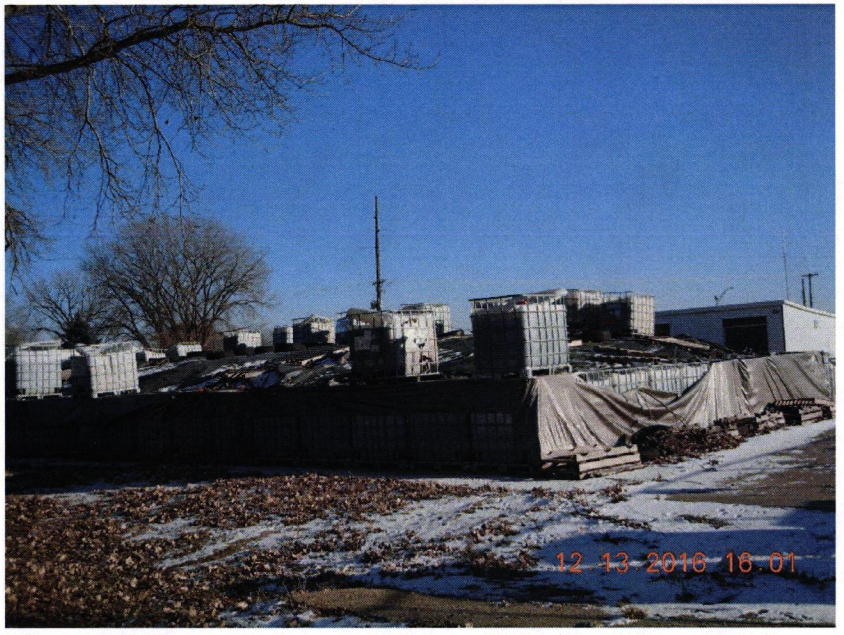
Photo of the building located at 3313 Northbrook Street, Sioux City, Iowa 51105. Photo taken facing north.

Photo 63 Michael J. Martin MJM

1318 11th Street
December 13, 2016

Photo of the building located at 1318 11th Street, Sioux City, Iowa 51105. Photo taken facing west.

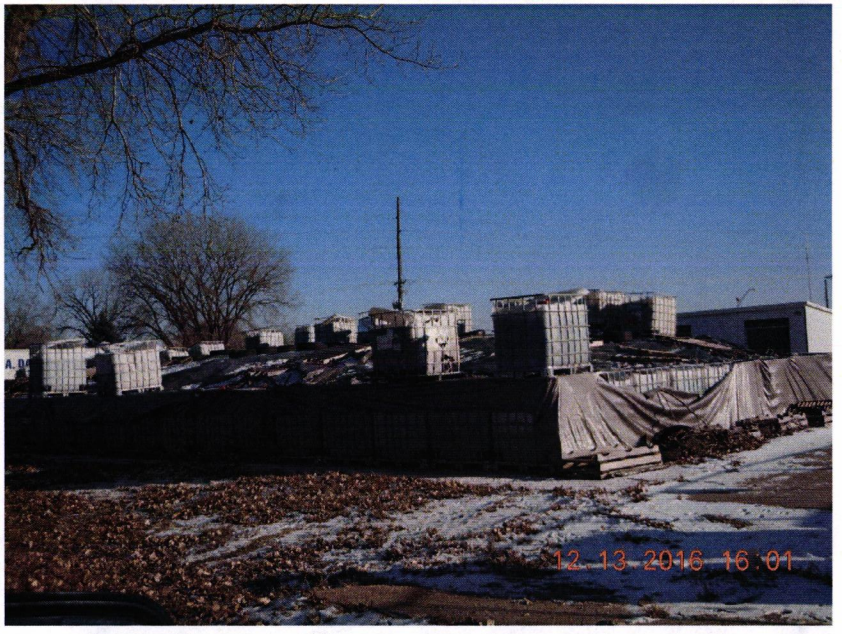
Photo 64 Michael J. Martin MJM



2301 G Street
December 13, 2016

Photo pile of the crushed mixed glass located at 2301 G Street, Sioux City, Nebraska 68766. Photo taken facing south.

Photo 65 Michael J. Martin MJM



2301 G Street
December 13, 2016

Same image as Photo 65. Photo taken facing south.

Photo 66 Michael J. Martin MJM

2301 G Street
December 13, 2016

Same image as Photo 65. Photo taken facing south.

Photo 67 Michael J. Martin

2301 G Street
December 13, 2016

Same image as Photo 65. Photo taken facing west.

Photo 68 Michael J. Martin

2301 G Street
December 13, 2016

Same image as Photo 65. Photo taken facing northwest.

Photo 69 Michael J. Martin

2301 G Street
December 13, 2016

Same image as Photo 65. Photo taken facing northwest.

Photo 70 Michael J. Martin

2301 G Street
December 13, 2016

Same image as Photo 65. Photo taken facing northwest.

Photo 71 Michael J. Martin

2301 G Street
December 13, 2016

Same image as Photo 65. Photo taken facing northwest.

Photo 72 Michael J. Martin

2301 G Street
December 13, 2016

Same image as Photo 65. Photo taken facing south.

Photo 73 Michael J. Martin

2301 G Street
December 13, 2016

Same image as Photo 65. Photo taken facing south.

Photo 74 Michael J. Martin